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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: NOV 01 1988

SUBJECT: NL Industries/Taracorp
Granite City, Illinois

FROM: Diane M. Spencer *D.M. Spencer*
RCRA Permitting Branch

THRU: Karl E. Bremer, Chief *Karl E. Bremer*
RCRA Permitting Branch

TO: Brad Bradley, RPM
RERB, IL/IN Section, Unit 3

The Remedial Investigation and request for ARARS ^{and} ~~was~~ reviewed. RCRA comments are included.

Taracorp notified and filed a Part A Permit Application with U.S. EPA for hazardous waste management activities in 1980. The facility, therefore, obtained RCRA interim status and RCRA regulations are applicable to the facility.

The State of Illinois is authorized to operate their hazardous waste management program in lieu of the Federal program, with the exception of HSWA requirements. Therefore, Federal RCRA comments should serve as a supplement to the State ARARS.

Table 8 lists potential ARARS, including references to both Federal and State requirements. This table is very general, listing only major sections of RCRA. The table should be rewritten in the FS to address the proposed site remedies listed in Table 11 or the alternatives which are being seriously considered.

Hazardous waste piles are regulated under 40 CFR Parts 264 and 265, Subpart L. At closure, the waste, waste residues, contaminated containment systems, and contaminated subsoils and leachate must be removed (40 CFR Part 264.258) and managed as hazardous waste. Since this site has managed only characteristic hazardous waste, removal action should continue until the soils and groundwater no longer exhibit the characteristic(s).

If wastes or contaminants remain in place, the unit must close as a landfill (40 CFR Part 264.310). This includes the placement of a RCRA compliant cover system and post-closure care.

Characteristic hazardous waste will be subject to RCRA land disposal restrictions by May 8, 1990. If off-site disposal will be carried

through as a viable alternative, the treatment standard must be met prior to land disposal. Also, if on-site "placement" will occur, the land disposal restrictions will be applicable.

ARARs for proposed site remedies (action-specific ARARs) will be provided when the alternatives are formally proposed.

cc: George Hamper, IL Section Chief